

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**WILLIAM JOSEPH WEBB JR.,
Plaintiff,**

CIV. ACT. NO. : 07-31-GMS

v.

**FIRST CORRECTIONAL MEDICAL,
ET. AL.,
Defendants.**

JURY OF TWELVE REQUESTED

**PLAINTIFF'S RESPONSE TO DEFENDANT CORRECTIONAL MEDICAL SERVICES
FIRST SET OF INTERROGATORIES**

1. If you contend that your civil rights have been violated, please identify each action that you claim constitutes a violation, who performed the action, what civil right or rights were violated by such action, and state all facts upon which you base each claim of violation.

ANSWER: The complaint answers most of these questions, with the exception of the John and Jane Does who Plaintiff defers the rest of this question until their identities have been found.

2. State your employers' name and address, dates of employment, and location of employment from 1997 to the present.

ANSWER: October 1996 to January 1997—Mainline Masonry Elsmere, DE.

1997—Tier man in dorm I at Gander Hill Prison.

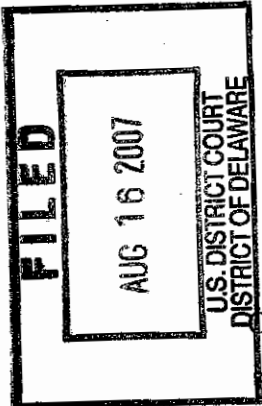
March 1998 to May 1999—J&T Improvements Prices Corner area.

June 1999 to July 1999—Commercial Roofing of DE Mowery Rd., New

Castle DE.

July 2004 to February 20, 2005—Kitchen D.C.C. Smyrna, DE.

June 2007 to present—Kitchen D.C.C. Smyrna, DE.



3. If you have been convicted of, or plead guilty to, any crime(s), please state the date of conviction(s) or plea(s), the Court(s) where the judgment(s) or plea(s) was entered, and the crime(s) for which you were convicted or plead, and the sentence imposed for such conviction(s) or plea(s).

ANSWER: Objection, the only relevant convictions are the cause of this litigation— Burg. 1st Degree: 10 years level 5 susp. after serving 5 for probation.

Ass. 1st Degree: 30 mos. level 5 susp. after serving 24 for probation.

End. Wel./Child: probation.

V.O.P.: 1997 I pled guilty to Burg. 2nd Degree in violation of my constitutional rights and pled guilty to an illegal sentence, along with the judge sentenced me to a sentence the judgment of conviction did not authorize.

4. Please list all doctors and/or health care professionals who treated or examined you from 1990 to the present, stating their names, addresses, phone numbers, specialties, if any, and the symptoms for which you treated with each doctor or health care professional.

ANSWER: Dr. Yeazdani—191 Christiana Rd., New Castle, DE—(302) 322-1353.(Family doctor).

Christiana Hospital—Ogletown Rd., Newark, DE— various years unknown with the exception of 1998 where I was treated for Cellulitis.

Note: There are other doctors and specialists but will have to wait for further production of my medical records.

5. If you attribute any physical, mental, or emotional injuries to the claimed violations of your civil rights, please identify each such injury, the area of your body affected and date when such area of your body became affected.

ANSWER: I defer this question for a future date as described in your request, also all injuries have not been fully identified as of this date.

6. If you have received treatment from any healthcare provider for any injury you attribute to the alleged violation of your civil rights, please identify the healthcare provider, the dates upon which you received treatment and the charges incurred to date.

ANSWER: I defer this question until a future date as described in your request, also an ongoing investigation will further answer this question at an appropriate time.

7. Please identify each person who has assisted you in preparation of any pleadings (including these Answers to Interrogatories) in the above litigation, indicating the person or persons' name(s), address(es), phone number(s), and describe in detail how they assisted you in preparing any pleadings.

ANSWER: Nobody.

8. What educational instruction have you received from 1990 to present, indicating which institution offered the education, the subject matter in which you received education, and the date of completion of any such education.

ANSWER: 1990—Graduated from William Penn High School.

1992—Completed Delaware Skills Center for Carpentry, etc...

2002—Completed 2 week Intro to Windows Computer Course
by DE Dept. of Education.

2002—Completed Office 2000 Computer Course by DE Dept. of
Education.

2002—Participated Carpentry but did not finish due to Life Skills.

2003—Completed Advanced Access 2000 Computer Course by DE
Dept. of Education.

2004—Completed Advanced Office 2000 Computer Course by DE
Dept. of Education.

2007—Completed Advanced Excel 2000 Computer Course by DE

Dept. of Education.

Currently a student at Ashworth College for Associate's Degree
in Computer Information Management at the 2nd Semester.

9. If you are claiming the right to receive money, please indicate the amount of money you are claiming and detail how you arrived at that amount.

ANSWER: As to the compensatory damages, they will be announced as a complete investigation is in progress which will be made in future discovery; as to punitive they will be announced after complete investigation has been completed by Plaintiff or by a settlement between the parties.

10. If you have ever been a party in any other civil lawsuits, either as a plaintiff or defendant, please indicate the Court which adjudicated the case, a general description of the claims involved you and how those claims resolved and when they resolved.

ANSWER: Objection, there is no relevancy in this subject matter.

I, William Joseph Webb Jr. declare that the foregoing facts are true and correct to the best of my knowledge under the penalty of perjury on this 14th day of August, 2007.

Submitted,



William Joseph Webb Jr.

#256056 / D/E F17T

1181 Paddock Road

Smyrna, DE 19977

Certificate of Service

I, William J. Webb Jr. hereby certify that I have served a true and correct copy(ies) of the attached Response to Interrogatories Upon the following parties/persons:

To: Eileen Kelly
820 North French Street
Wilmington, DE 19801

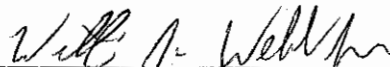
To: Patrick G. Rock
913 Market Street
Suite 800
Wilmington, DE 19801

To: First Correctional Medical
205 W. Giaconda Way
Suite 115
Tucson, AZ 85704

To: Dr. Ali
1301 E. 12th Street
Wilmington, DE 19809

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 14 day of August, 2007



William J. Webb Jr. #256056

NAME: William J. Webb Jr.
SBI# 256056 UNIT D/R FTT
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977



Clerk of the U.S. Dist. Ct.
844 King Street
Wilmington, DE
19801

"Legal Mail"